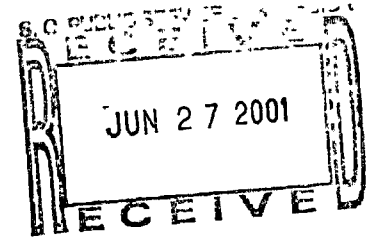




Post Office Box 752
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E-mail: caroline.watson@bellsouth.com
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Caroline N. Watson
General Counsel - South Carolina

June 27, 2001



Street Address:
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201

ACCEPTED

Legal

The Honorable Gary E. Walsh
Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: BellSouth Access Services Tariff Filing to Provide for
the Application of the Intrastate Terminating Switched
Access Rate to Messages Received from Carriers That Do
Not Include the Calling Party Number (Tariff No. 2001-
344)
Docket No.:

Dear Mr. Walsh:

Enclosed for filing please find the original and
fifteen copies of BellSouth's Response to Petition for
Leave to Intervene and Notice of Opposition to BellSouth
Tariff Filing Package No. SC 2001-031 of Sprint
Communications Company, L. P. in the above-referenced
matter.

By copy of this letter, I am serving this pleading upon
all parties of record.

Sincerely,

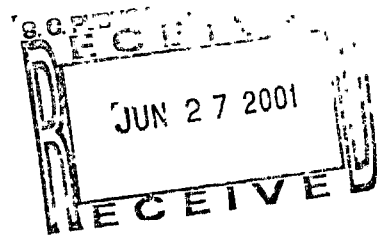
CN Watson
Caroline N. Watson *by nml*

CNW/nml

Enclosure

cc: F. David Butler, Esquire
Scott A. Elliott, Esquire

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA



In the Matter of:

BellSouth Access Services Tariff Filing)
To Provide for the Application of the)
Intrastate Terminating Switched Access)
Rate to Messages Received from Carriers)
That Do Not Include the Calling Party Number)
Tariff # 2001-344)

**BELLSOUTH'S RESPONSE TO PETITION FOR LEAVE TO INTERVENE AND
NOTICE OF OPPOSITION TO BELLSOUTH TARIFF FILING PACKAGE NO.
SC 2001-031 OF SPRINT COMMUNICATIONS COMPANY, L.P.**

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth") and files this, its Response to Sprint Communications Company, L.P.'s ("Sprint") Petition for Leave to Intervene and Notice of Opposition to BellSouth Tariff Filing Package No. SC 2001-031 in the above-styled matter. BellSouth further moves the Commission to deny Sprint's Petition for Leave to Intervene and Sprint's request that the Commission suspend the June 29, 2001 effective date of BellSouth's tariff filing.

I.

On June 15, 2001, BellSouth filed Tariff Filing No. SC 2001-031, in which it seeks to provide for the application of the intrastate terminating switched access rate to be applied to messages received from carriers that do not include the Calling Party Name ("CPN"). BellSouth's tariff will become presumptively valid June 29, 2001.

II.

Sprint maintains in its Petition to Intervene that BellSouth's proposed tariff would adversely affect Sprint in that BellSouth proposes to bill intrastate switched access charges on all calls that are local, interstate or international in nature and that this tariff does not provide for Sprint or other carriers to demonstrate to BellSouth that a particular call or calls were local or some other jurisdiction other than intrastate long distance.

BellSouth has attempted to resolve these issues with Sprint through discussions and a letter confirming BellSouth's proposed resolution. See attached June 20th letter from Mike Harper of BellSouth to Sid Turner, James Appleby, and Tony Key of Sprint. In the letter, BellSouth clarifies the application of the proposed tariff and memorializes the discussion between BellSouth and Sprint on these matters. Specifically, BellSouth agrees that:

- Sprint and BellSouth will jointly agree on a percentage of calls for which Sprint is not able to forward originating information, which percentage would constitute a floor for the purpose of applying the intrastate access rates to calls without sufficient originating information, and
- In the event that BellSouth applies the intrastate terminating access rate to calls with insufficient originating information as provided in the proposed tariff filing, Sprint would have the opportunity to request backup documentation on BellSouth's basis for applying the intrastate terminating access rate and to request that BellSouth change its application upon a showing of why the intrastate rate should not be applied.

III.

Inasmuch as BellSouth's proposed resolution adequately addresses Sprint's concerns as outlined in Sprint's petition over how the tariff could unduly impact it, BellSouth respectfully moves that the Commission deny Sprint's Petition for Leave to Intervene in this matter as well as its request that the proposed effective date of the tariff be suspended.

Respectfully Submitted,

BY: CN Watson
Caroline N. Watson
BellSouth Telecommunications, Inc.
1600 Williams Street, Suite 5200
Columbia, SC 29202

William F. Austin
Austin, Lewis & Rogers
Post Office Box 11716
Columbia, South Carolina 29211

ITS ATTORNEYS

June 20, 2001

Sprint
Sid Turner
James Appleby
Tony Key

This purpose of this letter is to clarify the application of proposed BellSouth intrastate access tariff language and represents the consensus of discussions between representatives of Sprint and BellSouth specifically related to the pending filings. The tariff change in each state would provide for the application of terminating intrastate access charges in cases where a carrier does not provide sufficient information to enable BellSouth to determine the actual jurisdiction of the call, most notably the Calling Party Number (CPN).

The proposed tariff language states that the intrastate rate will be applied to calls received without sufficient originating information. However, BellSouth and Sprint recognize and agree that there exists a percentage of calls that Sprint sends to BellSouth where it is not possible for Sprint to know, and therefore to send to BellSouth, the needed originating information. Therefore, BellSouth makes the following clarifications relating to its application of this proposed tariff revision:

- BellSouth and Sprint will jointly agree on a percentage of calls for which Sprint is not able to forward originating information. An example of such calls may be operator services calls where operator service systems are not compatible with Signaling System 7 (SS7). This agreed percentage of calls would constitute a "floor" for the purposes of applying the intrastate access rate to calls without sufficient originating information. In other words, BellSouth would only apply the intrastate terminating access rate to those calls lacking originating information that exceed the agreed-to, "floor", percentage.
- In the event that BellSouth applies the intrastate terminating access rate to calls without sufficient originating information as provided in the proposed tariff filings, Sprint will have the opportunity to request backup documentation of BellSouth's basis for such application, and further request that BellSouth change the application of the intrastate access rate upon a showing of why the intrastate rate should not be applied.

Any questions or comments regarding this issue may be directed to Mike Harper at 404 927-8076.

Mike Harper

STATE OF SOUTH CAROLINA

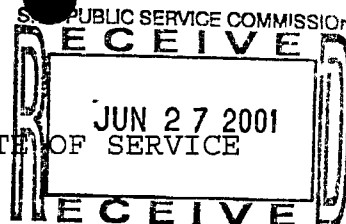
COUNTY OF RICHLAND

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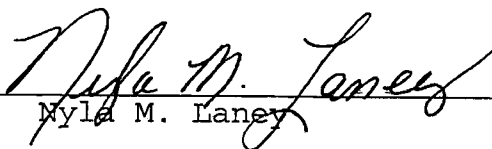
CERTIFICATE OF SERVICE



The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth's Response to Petition for Leave to Intervene and Notice of Opposition to BellSouth Tariff Filing Package No. SC 2001-031 of Sprint Communications Company, L.P. to be served by placing such in the care and custody of the United States Postal Service, with first-class postage affixed thereto and addressed to the following this June 27, 2001:

F. David Butler
General Counsel
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)

Scott A. Elliott, Esquire
Elliott & Elliott
721 Olive Street
Columbia, South Carolina 29205
(Sprint/United Telephone)


Nyla M. Laney